



EXECUTIVE DIRECTOR

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA FISH COMMISSION

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DEPUTY SECRETARY
ENVIRONMENTAL
PROTECTION

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June 1, 1984. ENVIRONMENTAL RESOURCES

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(RED)

The Honorable Nicholas DeBenedictis
Secretary
Department of Environmental Resources
9th Floor - Fulton Building
Harrisburg, PA 17120

Dear Secretary DeBenedictis:

I presume that you have been advised of the final order by the Acting Commissioner of Food and Drugs on May 14, lifting a stay on lowering the tolerance of PCBs in fish and shellfish from 5 ppm to 2 ppm, such stay having been ordered October 5, 1979, and the effective date of lifting the stay is 90 days from the publication in the Federal Register dated May 14, 1984. Having been supplied a copy of that document, including background, evidentiary hearing issues, etc., and estimates of the human food loss resulting from lowering the tolerance, I asked our staff to bring us up to date on the latest surveys. I am enclosing our statewide review of PCB levels in fish flesh for your information.

The purpose of this letter is to formally ask you what the Department of Environmental Resources intends to do about properly informing us of the human health implications of consuming fish containing significant amounts of PCBs. By copies of this letter, I am formally asking the same question of the Pennsylvania Department of Health and the United States Environmental Protection Agency.

Over the years we have had some areas where the PCBs in fish flesh exceeded the 5 ppm and warnings were issued, and in fact in one or two cases the waters were closed to fishing. I'm certain that you can understand that we have much to lose, no matter what position we assume, if waters are to be closed to fishing or harvest is prohibited. I think the first thing we should do is have current analyses. We will volunteer to help obtain current data if that is necessary.

I believe at this time the responsible environmental agencies should be telling us how frequently samplings should be made and where they

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Hon. Nicholas DeBenedictis:

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should be concentrated. The results can then be released to the public in a timely and responsible coordinated manner, which will build confidence and credibility for all agencies concerned, including our own. The problem exists and I submit that we should tackle it with our best efforts and properly inform the public. This is the least we can do.

ORIGINAL
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May I hear from you soon?

Sincerely,



Ralph W. Abele
Executive Director

A/t

cc: Thomas Eichler, Adm., EPA
Arnold Muller, M.D., Secretary of Health

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